

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

SUNSHINE PYROTECHNICS
COMPANY, LTD,

Plaintiff,

vs.

HALE FIREWORKS, LLC AND
ROBERT MITCHELL ("MITCH") HALE,

Defendants.

Case No.

**MOTION FOR ORDER TO COMPEL NON-PARTY DAVID RASMUSSEN TO
COMPLY WITH PROPERLY SERVED SUBPOENA**

COME NOW Defendants, by counsel, and move the Court under Fed. R. Civ. P. 45(d) to issue an order compelling David Rasmussen ("Rasmussen") to comply with a subpoena issued from this Court and served upon him for the production of documents and information.

As more fully set forth in the accompanying Suggestions in Support of this Motion, despite being properly served with the subject Subpoena, as of the date of the filing of this Motion, Rasmussen has failed to object to the Subpoena, failed to file a motion to quash or modify the Subpoena under Rule 45(d)(3), failed to provide documents or other information responsive to the Subpoena, and failed to otherwise seek relief from this Court. Moreover, the documents requested in this Subpoena are highly relevant to Defendants' claims and defenses and have thus far been unavailable from other sources.

WHEREFORE, Defendants request the Court enter an order compelling David Rasmussen to comply with the Subpoena and produce the requested

documents and electronically stored information, and to grant such other relief the Court deems just and proper.

Respectfully Submitted,

HUSCH BLACKWELL LLP

/s/ J. Michael Bridges

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned certifies a true and accurate copy of the foregoing instrument was forwarded on August 2, 2018, by the Court's electronic notification system, to counsel in this action and to the following via U.S. mail, postage prepaid and Certified Mail, Return Receipt Requested and email:

David Rasmussen
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Republic, Missouri 65738
Daver002@yahoo.com

/s/ J. Michael Bridges

J. Michael Bridges